

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF RICHARD ZLETZ

I, RICHARD ZLETZ, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in the vicinity of the World Trade Center when the terrorist attacks of the World Trade Center occurred.

4. I went to downtown Manhattan to meet with an attorney whose office was near the World Trade Center to discuss a case I had with him. I never made it to the meeting.

5. I was in lower Manhattan at the corner of Broadway and Cedar Street on the East side when the first tower collapsed after the plane hit the tower and I received physical injuries in the escape. In the course of the attack and my escape, I witnessed atrocities beyond the imagination

of the average citizen, I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: My eyes were burned from debris in the air; I now suffer from Asthma, Chronic Rhinosinusitis and Obstructive Sleep Apnea as well as Obstructive Airway Disease. I also have just recently been advised that I have extra heart beats which may be related to an insufficiency of oxygen to my heart which could be related to the sleep apnea. In addition, I have been monitored for the presence of nodules in my lungs. The monitoring must continue on a regular basis to determine if cancer is present.

7. I have also suffered from Post-Traumatic Stress Disorder since September 11, 2001 due to the horrors I witnessed that day. I saw the South Tower explode and the top quarter of the tower collapse into the bottom portion. I still see that picture in my mind today. It was as if a war zone had erupted around me. I dove under a car to try to save myself and get away from falling debris. Other individuals struggled to also get under the car. There was dust and debris everywhere. I was enveloped into a cloud of dust and I thought I would die. I could not see at that time, since my eyes were burned from debris and smoke. At some point, someone pulled me out from under the car. Someone, I'm not sure who, helped me get to Downtown Beekman Hospital where I was treated.

8. I sought medical attention for my injuries and have continued with ongoing treatment for the physical injuries as well as therapy for the Post-Traumatic Stress Disorder and depression.

Attached as Exhibit (B) to this Declaration is a true and correct copy of my medical records related to the initial treatment that I received following the September 11, 2001 terrorist attacks.

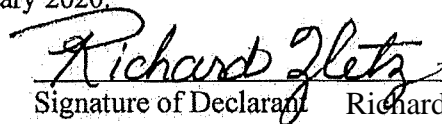
9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

10. Attached as Exhibit (C) to this Declaration are true copies of the Letters dated 12/11/13 and 7/19/16 certifying me as suffering from Obstructive Airway Disease, Asthma, Upper Respiratory Disease and Obstructive Sleep Apnea signed by John Howard, M.D. Administrator of the World Trade Center Health Program.

10. I previously pursued a claim (Claim Number VCF 212-006336) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 15TH day January 2020.


Signature of Declarant Richard Zletz

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**